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March 25, 2020

Via Electronic Filing

The Honorable Magistrate Judge Robert W. Lehrburger
U.S. District Court Southern District of New York
500 Pearl St
New York, NY 10007

Re: *Basurto et al v. Eda Food Inc. et al* - Request for Extension
Case No.: 1:18-cv-08858-AJN

Dear Honorable Judge Lehrburger:

This law firm represent the Defendants Eda Food Inc., Karena Foods Inc. and Gary Tulsiani (collectively, the “Defendants”) in the above-referenced action.

Pursuant to Your Honor’s Individual Motion Practice Rules I(A) and I(F), this letter respectfully serves to request that the telephonic settlement conference currently scheduled for April 1, 2020 at 9:30 a.m. be adjourned *sine die*, until it is reasonably practical to schedule an in-person settlement conference.

This is the first request of its kind, and is made on consent of Plaintiff’s counsel.

The basis of the request is that the COVID-19 crisis has decimated Defendants’ restaurant business. As a result of the unprecedented economic fallout of the COVID-19 crisis, Defendants need time to assess their financial wherewithal on a going forward basis.

In light of the foregoing, Defendants respectfully request that the telephonic settlement conference currently scheduled for April 1, 2020 at 9:30 a.m. be adjourned *sine die*, until it is reasonably practical to schedule an in-person settlement conference.

Thank you, in advance, for your time and attention.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Joshua D. Levin-Epstein
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Cc: Plaintiffs’ counsel (via ECF)